

# **EXHIBIT F**

K&L GATES

April 25, 2024

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Via Federal Express – First Class Mail -- E-mail  
American Dream Resorts, Ltd.  
123 N. Sea Road – Unit 516  
Southampton, NY 11968  
Attn: Joseph Gentile, Jr. - [jr@americandreamresorts.com](mailto:jr@americandreamresorts.com)

Via Federal Express – First Class Mail  
Joseph Gentile, Sr.  
401 Supor Blvd  
Harrison, NJ 07029

Re: Supor Properties Enterprises LLC, et al.,  
Bankruptcy Case No. 24-13427 (SLM)

Supor Properties Enterprises LLC, et al., v. American  
Dream Resorts, Ltd, et al.,  
Adv. Pro. No. 24-1174 (SLM)

Dear Sirs:

This firm represents JS Realty Properties, LLC (“JS Realty”) in connection with (i) the above referenced jointly administered bankruptcy proceedings pending in the United States Bankruptcy Court in the District of New Jersey (the “Bankruptcy Case”), and (ii) the above referenced adversary proceeding (the “Adversary Proceeding”). As referenced in the Bankruptcy Case and Adversary Proceeding, JS Realty owns the real property located at 500 Supor Blvd., Harrison, NJ, a/k/a 401 Supor Blvd. (the “401 Supor Property”).

Among the claims asserted in the Adversary Proceeding is the demand of JS Realty to remove American Dream Resorts, Ltd. and/or other affiliated entities and individuals (collectively “ADR”) from 401 Supor Property. ADR is occupying a portion of the 401 Supor Property without a lease, without any agreement or other authorization permitting such occupancy. ADR has no legally cognizable rights or entitlements to the 401 Supor Property or the occupancy thereof.

We note that ADR has not paid any rent or provided any consideration in connection with this unauthorized occupancy. We also note ADR has not provided evidence of insurance related to its occupancy of the 401 Supor Property.

We also understand that Joseph Gentile, Sr. and other individuals affiliated with ADR are living at the 401 Supor Property without consent of JS Realty and in violation of applicable laws. Specifically, the 401 Supor Property is zoned as Industrial (“I”) under the Zoning Ordinance of the Town of Harrison with a designated TV Film Studio Overlay. *See* Land Development Ordinance of the Town of Harrison, Title 17; Article IV; Chapter 17.81. Under the Land Development Ordinance “[n]o use or structure shall be permitted in the Town which is not listed as a permitted, accessory or conditional use. All other uses shall be prohibited. *See* Chapter 17.81.6. Residential occupancy ***is not*** a Permitted Use in either the Industrial zone or in the TV Film Studio Overlay zone. *See* Chapter 17.81.4 – Schedule II-C; *see also* Chapter 17.84. Residential use of the 401 Supor Property is therefore prohibited. Any prohibited use is subject to the enforcement rights of the Town of Harrison under Chapter 17-120 and the imposition of penalties for violation(s) under Chapter 17-121.

For purposes of clarity, JS Realty has not authorized, allowed or consented to any residential occupancy of the 401 Supor Property and will hold Joseph Gentile, Sr. and ADR responsible for all consequences stemming from any such illegal residential occupancy.

JS Realty has, on numerous occasions, demanded that ADR immediately vacate, surrender, and quit all manner of possession and occupancy of the 401 Supor Property. Thus far, ADR has refused to vacate the 401 Supor Property. JS Realty hereby re-iterates and re-asserts its demand that ADR immediately vacate the 401 Supor Property and otherwise surrender possession and quit occupancy of same.

JS Realty specifically reserves and preserves all rights, remedies, and claims available to it at law or in equity. All rights remedies and claims of debtors and plaintiffs in the Bankruptcy Cases and Adversary Proceeding are reserved, and are none are waived, modified or compromised.

Very truly yours,

*/s/ David S. Catuogno*

David S. Catuogno

cc: Daniel M. Eliades, Esq.